

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JANE DOE,)	Civil Action No. 2:24-cv-00051-WSS
)	
<i>Plaintiff,</i>)	Honorable William S. Stickman IV
)	
v.)	
)	
PINE-RICHLAND SCHOOL DISTRICT,)	
)	
<i>Defendant.</i>)	
)	
)	

**MOTION FOR EXTENSION TO FILE BRIEF IN OPPOSITION TO PLAINTIFF’S
MOTION FOR PRELIMINARY INJUNCTION**

AND NOW COMES, the Defendant, Pine-Richland School District (“the District”), by and through its attorneys, Christina L. Lane, Esquire and Krisha A. DiMascio, Esquire of Maiello, Brungo & Maiello and file the following Motion for Extension to File Brief in Opposition to Plaintiff’s Motion for Preliminary Injunction, and in support thereof aver as follows:

1. The present case was initiated by the filing of a Complaint and Issuance of Summons on January 12, 2024.
2. Plaintiff served summons on the Defendant by personal service on or before January 23, 2024.
3. Plaintiff then filed a Motion for Preliminary Injunction on February 2, 2024.

4. The parties agreed that the District's responsive pleading would not be due until March 22, 2024 after the status conference regarding the preliminary injunction.

5. An Order of Court dated February 5, 2024, was entered, requiring Defendant to file a Response to Plaintiff's Motion for Preliminary Injunction by March 6, 2024 and that Plaintiff's Reply was due by March 20, 2024.

6. The District is requesting an Extension of Time to File a Response Brief to Plaintiff's Motion for Preliminary Junction because at this time the District is still unaware of identity of Jane Doe.

7. In accordance with the Court Rules, the Plaintiff should have sought a Protective Order prior to filing his complaint but has not.

8. The District has agreed to the Plaintiff's Proposed Protective Order as to Jane Doe. However, they have not received any confirmation of the identity of Jane Doe to date.

9. The Parties have agreed to try to remedy the Preliminary injunction amongst themselves. However, the District has made clear to the Plaintiff that the District cannot do so without knowing the identity of Jane Doe.

10. The District cannot do an analysis of potential harm, and status quo without knowing the identity of Jane Doe.

11. Therefore, the District requests an Extension to File a Brief in Opposition on the Preliminary Junction to March 22, 2024, when the District's is to file a Responsive Pleading to the Complaint is due as without knowing who Jane Doe is it poses an extreme hardship on the District to file its brief on or before its current due date.

12. The District reserves the right to ask for additional extensions if the District does not know the identity of Jane Doe prior to the filling date.

WHEREFORE, Defendant, Pine-Richland School District, respectfully requests that this Honorable Court grant this Motion for Extension to File Brief in Opposition to Plaintiff's Motion for Preliminary Injunction.

RESPECTFULLY SUBMITTED,

MAIELLO, BRUNGO & MAIELLO, LLP

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/s/Krishna A. DiMascio, Esq.

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Attorneys for Defendant,

Pine-Richland School District

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 4th day of **March 2024**, I electronically filed the foregoing **MOTION FOR EXTENSION TO FILE BRIEF IN OPPOSITION TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION** with the Clerk of Court using the CM/ECF System, which will send notification of such filing to the following parties and/or counsel of record in this matter:

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Respectfully submitted,

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